



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 11, 2021

BY ECF

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Robert Hadden,**
20 Cr. 468 (RMB)

Dear Judge Berman:

Trial in this matter is scheduled to commence on January 5, 2022. With the defendant's consent and for the reasons that follow, the Government respectfully submits this letter to request a brief trial adjournment to a date in March 2022, as well as a corresponding adjournment of the motion schedule.

By way of background, trial had previously been scheduled to start on September 20, 2021. On April 15, 2021, the defendant requested an adjournment of the September trial date to a date in early 2022, as well as an adjournment of the motion schedule, citing, among other things, the voluminous discovery. (Dkt. 82). The Government opposed the defendant's request on the basis that such an extended adjournment was premature and inconsistent with the victims' interests in this case. (Dkt. 83). On April 15, 2021, the Court granted the defendant's request in part and scheduled the trial to begin on January 5, 2022. (Dkt. 84).

The Government respectfully requests, with the defendant's consent, a brief adjournment of the trial to a date in March 2022. The Government submits that this brief adjournment is in the interests of justice and in the interests of the victims because it will ensure continuity of Government counsel. Specifically, the adjournment will ensure that at least one of the prosecutors who was assigned to this case during the early stages of the Government's investigation and who participated in numerous victim and witness interviews, as well as the Government's discovery productions, will be able to participate at trial.¹ In this matter, continuity of Government counsel

¹ AUSA Pomerantz, who has been assigned to this matter from its very early stages, has a trial which is scheduled to begin on November 29, 2021 before the Honorable Alison J. Nathan, and which is expected to last approximately four weeks. Accordingly, the brief adjournment will permit AUSA Pomerantz to participate in this trial. Of the other two other prosecutors who were assigned to this matter from its very early stages, AUSA Lonergan will no longer be employed by the U.S. Attorney's Office as of August 2021, and AUSA Comey is no longer assigned to this matter.

cc: Defense Counsel (By Email and ECF)